AR201-13117

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June 19, 2001

The Honorable Christine Todd Whitman
Administrator
U. S . Environmental Protection Agency
Ariel Rios Building, Room 3000, #1101-A
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Subject: PCRM Comments on FMC Corp. Test Plans for 2,3-dihydro-2,2-dimethyl-7-benzofuranol (7OH) and 3-chloro-2-methyl-l -propene (MAC)

Dear Administrator Whitman:

FMC Corporation is in receipt and has taken note of the June 13 comments from the Physicians Committee for Responsible Medicine (PCRM) regarding the handling of test plans for the subject chemicals under the High Production Volume Chemical Challenge Program. As a member of the American Chemistry Council, we are firmly committed to our industry's Responsible Care ® Program. We understand the importance of communicating relevant information about our products that contributes to the protection of human health and the environment. We are equally committed to EPA's HPVC program as an important vehicle for improving public understanding.

I have looked into the issues raised and acknowledge on behalf of the company that in this specific instance we should have conducted certain aspects of our testing program consistent with amendments to the program's protocols. With this communication we reaffirm our commitment to the spirit and terms of the program, including those provisions on animal protection. To that end, we assure the Agency that we have neither initiated dermal toxicity testing for the subject chemicals, nor do we plan to do so in the future. In addition, we plan to submit information to the Agency that will qualify two of our other products for reduced SIDS testing. This will eliminate the need to conduct the combined reproduction/ developmental toxicity study.

As both a practical matter, we strive to avoid unnecessary testing and prefer instead to make the best use of existing studies to satisfy the public's need

for hazard information. However, in certain cases - such as genotoxicity studies for 70H - in vivo studies may be necessary in order to determine whether in vitro results may have yielded false positives, Under these circumstances, the results of an in vivo study would provide the most relevant information to the characterization of the potential hazard to humans. This is our understanding of the goal of the HPVC program.

In closing, let me say that we at FMC Corporation continue to be enthusiastic about the collaborative spirit embodied in the HPVC Program and the contribution it will make to public welfare.

Sincerely,

Jerry Prout
Vice President, Government Affairs

cc: The Honorable Sherwood Boehlert
The Honorable Ken Calvert
The Honorable Jerry Costello
The Honorable Robert C. Smith
Council on Environmental Quality
Steve Johnson, Assistant Administrator for the Office of Pollution, Prevention, and Toxic Substances
Nicole Cardello, Physicians Committee for Responsible Medicine
William Walter, Executive Vice President, FMC Corporation